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U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.

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Attorney for Plaintiffs
VICKI J. AZNARAN and
RICHARD N. AZNARAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VICKI J. AZNARAN and RICHARD N.
AZNARAN,

No. CV-88-1786-JMI (Ex)

Plaintiffs,

DECLARATION OF FORD GREENE
REGARDING ALLEGED "TAINT"
OF JOSEPH A. YANNY, ESQUIRE

vs.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Date: September 9, 1991
Time: Discretionary
Ct: Hon. James M. Ideman

Defendants.

AND RELATED COUNTER CLAIM

FORD GREENE declares:

1. I am an attorney licensed to practice law in the Courts of the State of California, am admitted to the Bar of this Court, and am the attorney of record for Vicki J. Aznaran and Richard N. Aznaran, plaintiffs herein.

2. Defendants, and their counsel, have recently submitted an increasingly shrill litany of degrading aspersions regarding the nature of my alleged affiliation with defendants' former lawyer, Joseph A. Yanny. The purpose of this declaration is respond

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1 thereto in a general manner because a point by point refutation is
2 not worth the time, effort and trouble required to articulate.

3 3. The suggestion, much less the claim, that I am somehow
4 the puppet of Yanny is ludicrous. In short, my response to the
5 allegations of defendants regarding the Yanny taint and the extent
6 to which it has been alleged to be spread on me is as follows:
7 My writing in this case has thus far been stylistically and
8 substantially consistent. As the court will note from my
9 opposition to Scientology's initial summary judgment motion (with
10 the exception of the injudicious use of the term "Cult") in this
11 case to my most recent oppositions, I have a particular style of
12 legal expression that is my own. The content and approach thereof
13 is relatively consistent. The hand that so writes is mine, not Mr.
14 Yanny's.

15 4. I was responsible for articulating the theory which the
16 California Supreme Court in Molko v. Holy Spirit Association (1988)
17 46 Cal.3d 1096 found persuasive. That theory primarily deals with
18 the interrelationship between deceit and coercion as those
19 ingredients impact upon an individual's ability to reason and
20 capacity to exercise an informed consent to organizational
21 affiliation. I am convinced that "brainwashing" is the intentional
22 and deliberate application of specific and identifiable techniques
23 designed to undermine an individual's ability to reason and
24 severely impair his capacity to exercise an informed consent so as
25 to replace those volitional ingredients with an indiscriminate and
26 unconditional obedience to the commands of the leadership. I
27 understand the manner in which brainwashing attacks an individual's
28 sense of identity and achieves dominance of such individual. I am

1 convinced that a coercive, closed group or "cult" is a group of
2 people, often masquerading in the guise of a religion, the members
3 of which are unconditionally and indiscriminately obedient to the
4 commands of a single leader who claims to have a direct
5 relationship with God, or some greater-than-human source of
6 authority.

7 5. In varying ways, and from different points of reference,
8 my participation in the case at bar has involved the application,
9 within the confines of the law, of the specialized knowledge I
10 possess having to do the deceit and undue influence practiced by
11 the Scientology organization. I believe my analysis in this
12 regard, as it has been expressed in writing in this case, is
13 ascertainable and has been consistent during the pendency of the
14 case at bar. Joseph Yanny never has had anything to do with the
15 way I think and the manner in which I apply and/or express the
16 knowledge I possess.

17 6. I have met with John Koresko on a Saturday and Sunday in
18 early August. In assisting Mr. Yanny accomplish the transition of
19 the case back to my office, he delivered to me papers that had been
20 filed in this matter during the period that Yanny was attorney of
21 record (including papers, filed by defendants, which falsely stated
22 that I had been in a rehabilitation facility for substance abuse).
23 Mr. Koresko offered his assistance in helping me get up to speed.
24 I provided Mr. Koresko with copies of Scientology's table of
25 authorities extracted from each of its six pending motions and sent
26 him to the Marin County Law Library with instructions to make
27 photocopies of each of the cases that was not a California case (I
28 have a full-service California law library). I received no

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1 litigation instructions of any sort from Koresko, Yanny originated
2 or otherwise.

3 7. I am grateful for the on-going assistance that I have
4 received from Gerry Armstrong. While I have worked - at times
5 around the clock - he has assembled the products of my labors and
6 ensured that they were prepared for filing and service. I have
7 received no Yanny originated suggestions regarding how to litigate
8 against Scientology from Armstrong and the suggestion that he is
9 Yanny's shill and that I am the dupe of both is laughable.

10 8. I am informed and believe and allege thereon that
11 defendants have in the past, and will continue in the future, to
12 exploit their fallen relationship with their former attorney as a
13 manner of attempting to obfuscate the real issues in the case at
14 bar. It is more expedient for Scientology to cry wolf and attempt
15 to engender sympathy than to meet the issues head on and fight
16 clean.

17 9. During my participation in the instant litigation, my
18 office, my home, the home of girlfriend and her person have been
19 the subjects of repeated and on-going surveillance. In spring
20 1989, Scientology operatives rented an apartment unit across the
21 street from my office in order to maintain around-the-clock
22 surveillance of me, my clients and friends. During the last month
23 the street in front of my office and the parking lots across the
24 street have been crawling with Scientology investigators with their
25 cameras, video-cameras, binoculars, cellular telephones and yellow
26 legal pads. My neighbors have expressed fear to me regarding the
27 meaning of such activities. Scientology, through its chief
28 "investigator" Eugene Ingram, has managed to generate

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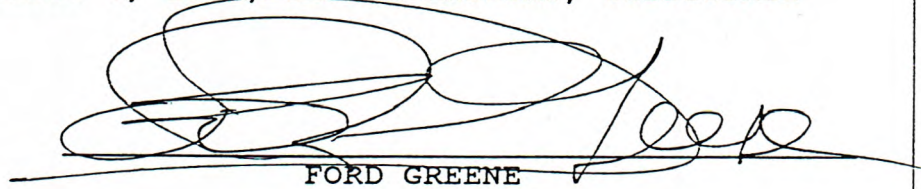
1 investigations of me by the F.B.I., Los Angeles County District
2 Attorney's Office and State Bar for allegedly committing perjury in
3 what I am informed and believe has been an effort to obtain my
4 "disqualification" from representing the Aznarans, or subject me to
5 retribution for being so bold as to stand in opposition to the
6 Scientology organization. I am informed and believe that the
7 reason that Eric Lieberman telephoned me in February or March 1991
8 in order to seek a stipulated continuance of the April 9 trial date
9 in the case at bar was so that Ingram would have enough time to
10 generate a criminal prosecution against me. I am informed and
11 believe that no such prosecutions will be forthcoming. I am
12 informed and believe that in the spring of 1989 Scientology
13 operatives searched through my office garbage, in order to find the
14 names of cases, clients, and opposing counsel whom then were
15 contacted in an attempt to stir up trouble for me; I have been
16 contacted by such people who have reported such activities to me.

17 10. I am losing patience with the tactics of my adversaries.
18 I assure the court that the moral conviction required to endure
19 such extra-judicial harassment, and work around the clock
20 responding to the pounds of motions filed by Scientology, would
21 never exist were I another man's puppet.

22 11. I am my own man and do not consult with Joseph Yanny
23 concerning litigation strategies in this case.

24 Under penalty of perjury pursuant to the laws of the United
25 States I hereby declare that the foregoing is true and correct
26 according to my first-hand knowledge, except those matters stated
27 to be on information and belief, and as to those matters, I believe
28 them to be true.

Executed on September 4, 1991, at San Anselmo, California



FORD GREENE

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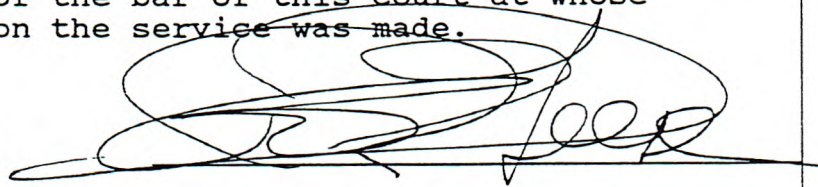
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1 PROOF OF SERVICE

2 I am employed in the County of Marin, State of California. I
3 am over the age of eighteen years and am not a party to the above
4 entitled action. My business address is 711 Sir Francis Drake
5 Boulevard, San Anselmo, California. I served the following
6 documents: DECLARATION OF FORD GREENE REGARDING ALLEGED "TAINT"
7 OF JOSEPH A. YANNY, ESQUIRE
8 on the following person(s) on the date set forth below, by placing
9 a true copy thereof enclosed in a sealed envelope with postage
10 thereon fully prepaid to be placed in the United States Mail at San
11 Anselmo, California: SEE ATTACHED SERVICE LIST

- 12 (By Mail) I caused such envelope with postage thereon
13 fully prepaid to be placed in the United States
14 Mail at San Anselmo, California.
- 14 (Personal Service) I caused such envelope to be delivered by hand
15 to the offices of the addressee.
- 16 (State) I declare under penalty of perjury under the
17 laws of the State of California that the above
18 is true and correct.
- 18 (Federal) I declare that I am employed in the office of a
19 member of the bar of this court at whose
20 direction the service was made.

20 DATED: September 4, 1991



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AZNARAN vs. SCIENTOLOGY

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